

UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY

JANE DOE, a minor, through
her parents and legal guardians,
JANE ROE and JOHN ROE,

Plaintiff,

v.

JOHN SMITH, a minor, by and
through his parent(s) and legal
guardian(s), JOE SMITH. and JANE
SMITH,

Defendant.

Case No. 2:24-cv-00634-ES-JBC

RENEWED MOTION
&
NOTICE OF RENEWED MOTION FOR PRELIMINARY INJUNCTION

Pursuant to the Court's February 14, 2024 Order [Doc. 24], *Federal Rule of Civil Procedure* 65 and Local Rule 65.1 Plaintiff, Jane Doe, by and through parents and legal guardians, Jane Roe and John Roe, submits this Renewed Motion and Notice of Renewed Motion for Preliminary Injunction against Defendant, John Smith, by and through his parent(s) and legal guardian(s), Joe Smith and Jane Smith, requesting a preliminary injunction enjoining and restraining Defendant, directly and indirectly, from the following throughout the duration of this case:

- (a) viewing, accessing, displaying, disclosing, sharing, and transmitting any nude images of Jane Doe;
- (b) deleting, destroying, secreting, or modifying any data on his smart phone, computer(s) and other electronic devices; and

- (c) disclosing, directly or indirectly, Jane Doe's identity and the identity of her parents and immediate family members, in order to maintain Jane Doe's confidentiality.

PLEASE TAKE NOTICE that Jane Doe shall rely on the following evidence in support of this Renewed Motion:

1. Deposition Transcript of John Smith, attached hereto as **CONFIDENTIAL EXHIBIT 1**;
2. Deposition Transcript of "T.B.," attached hereto as **CONFIDENTIAL EXHIBIT 2**;
3. John Smith's Answers to Interrogatories, attached hereto as **CONFIDENTIAL EXHIBIT 3**;
4. John Smith's Responses and Objections to Jane Doe's First Request for Production, attached hereto as **CONFIDENTIAL EXHIBIT 4**;
5. Defendant's Snapchat "Associated Accounts" log produced by Snap Inc., attached hereto as **CONFIDENTIAL EXHIBIT 5**;
6. Redacted data contained in Defendant's Snapchat "Conversations" log produced by Snap Inc., attached hereto as **CONFIDENTIAL EXHIBIT 6**;
7. Defendant's Snapchat "Call Logs" produced by Snap Inc. ("Snapchat"), attached hereto as **CONFIDENTIAL EXHIBIT 7**;
8. *"Revealed: the names linked to ClothOff, the deepfake pornography app,"* The Guardian, Feb. 29, 2024, Safi, Michael and Atack, Alex, attached hereto as **EXHIBIT 8**;

9. ClothOff.io Home Page, attached hereto as **EXHIBIT 9**;

10. Snap Inc. Correspondence dated February 27, 2024, attached as **CONFIDENTIAL EXHIBIT 10**; and

11. Text message exchange between Joe Smith and John Roe, attached as **CONFIDENTIAL EXHIBIT 11**.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order dated February 14, 2024 [Doc. 24], Defendant's Response in Opposition to this Renewed Motion is due **March 18, 2024**.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's Order dated February 14, 2024 [Doc. 24], this Renewed Motion will be called up for hearing before The Honorable Esther Salas, United States District Judge, District of New Jersey, on **March 26, 2024 at 12:30 p.m.**

Dated this 12th day of March, 2024.

Respectfully submitted,

/s/ Shane B. Vogt

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Co-Counsel/Local Counsel for Plaintiff

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on March 12, 2024, the foregoing document was filed with the Court's CM/ECF system, which will send electronic notice to all counsel of record.

/s/ John Gulyas
Attorney